

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively  
Consolidated SIPA Liquidation of Bernard L.  
Madoff Investment Securities LLC and the Chapter  
7 Estate of Bernard L. Madoff,

Plaintiff,

v.

SIX SIS AG,

Defendant.

Adv. Pro. No. 12-01195 (CGM)

**STIPULATION AND ORDER REGARDING FILING OF  
REPLY IN FURTHER SUPPORT OF MOTION TO DISMISS**

Plaintiff Irving H. Picard (the “Trustee”), trustee for the substantively consolidated liquidation proceeding of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–lll (“SIPA”), and the chapter 7 estate of Bernard L. Madoff, and defendant SIX SIS AG (“Defendant” and, with the Trustee, the “Parties”), by and through their respective and undersigned counsel, state as follows:

**WHEREAS**, on October 24, 2022, the parties filed and the Court so-ordered a Second Amended Stipulation and Order setting December 13, 2022 as the deadline for Defendant to respond to the Second Amended Complaint in the above-captioned action; February 7, 2023 as the deadline for the Trustee to respond to any filed motion to dismiss; and March 7, 2023 as the deadline for Defendant to file a reply. ECF No. 128;

**WHEREAS**, on December 13, 2022, Defendant timely filed a Motion and Memorandum of Law to Dismiss the Trustee’s Second Amended Complaint (the “Motion”). ECF Nos. 130–136. Defendant noticed the Motion for hearing on April 19, 2023, at 10:00 a.m.;

**WHEREAS**, on February 7, 2023, the Trustee timely filed his Opposition to Defendant’s Motion. ECF Nos. 137–138;

**WHEREAS**, Defendant has requested additional time to file its reply and the Trustee has consented to the extension.

*[Remainder of page intentionally left blank]*

**IT IS HEREBY STIPULATED AND AGREED** that the deadline for Defendant to file  
a reply in further support of its Motion shall be extended to and including March 14, 2023.

Dated: March 6, 2023  
New York, New York

/s/ David J. Sheehan  
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Liquidation of Bernard L. Madoff  
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*Special Counsel for Irving H. Picard, Trustee  
for the Substantively Consolidated SIPA  
Liquidation of Bernard L. Madoff Investment  
Securities LLC and the Chapter 7 Estate of  
Bernard L. Madoff*

**SO ORDERED.**

**Dated: March 7, 2023  
Poughkeepsie, New York**



**/s/ Cecelia G. Morris**

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**Hon. Cecelia G. Morris  
U.S. Bankruptcy Judge**